| | LEWIS BRISBOIS BISGAARD & SMITH LI | p | |
|---------------------------------|--|--|--|
| 1 2 3 4 5 6 7 | S. BRENT VOGEL Nevada Bar No. 006858 Brent.Vogel@lewisbrisbois.com ETHAN M. FEATHERSTONE Nevada Bar No. 11566 Ethan.Featherstone@lewisbrisbois.com 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 Telephone: 702.893.3383 Facsimile: 702.893.3789 Attorneys for Non-Party NaphCare, Inc. and | | |
| 8 | Defendant Bradford T. McLane, CEO NaphCare, | | |
| 9 | UNITED STATES DISTRICT COURT | | |
| 10 | DISTRICT OF NEVADA, SOUTHERN DIVISION | | |
| 11 | | | |
| 12 | MICHAEL GERARD NAESSENS, | Case No. 2:22-cv-01438-JAD-DJA | |
| 13 | Plaintiff, | | |
| 14 | VS. | STIPULATION AND ORDER TO SUBSTITUTE PARTY, AND DISMISS | |
| 15 16 | LAS VEGAS METROPOLITAN POLICE DEPARTMENT CCDC; BRADFORD T. MCLANE, CEO NAPHCARE, INC; | DEFENDANT BRADFORD T. MCLANE, CEO OF NAPHCARE, INC. | |
| 17 | LAWRENCE H. RICHARDSON, JR.; AMANDA LEIGH HEDRICK, | ECF Nos. 11, 32, 34 | |
| 18 | Defendants. | | |
| 19 | | | |
| 20 | | | |
| 21 | Defendant Bradford T. McLane, non-party NaphCare, Inc., by and through their counsel, S. | | |
| 22 | Brent Vogel, Esq. and Ethan Featherstone, Esq. of LEWIS BRISBOIS BISGAARD & SMITH, | | |
| 23 | LLP, and Plaintiff Michael Gerard Naessens, pro se, hereby stipulate and agree that the Real Parties | | |
| 24 | in Interest is "NaphCare, Inc." and stipulate to substitute NaphCare, Inc. in lieu and stead of | | |
| 25 | Bradford T. McLane, CEO of NaphCare, Inc. pursuant to Fed. R. Civ. P. 25(c). | | |
| 26 | Upon substitution, NaphCare, Inc. will file its Response to the Complaint within fourteen | | |
| | (14) days, with a further fourteen days (14) to serve its initial disclosures pursuant to Fed. R. Civ. | | |
| 27 | P. 26(a)(l). | | |
| 28 | | | |

LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW

4885-8917-1006.1

| 1 | Upon substitution, Bradford T. McLane, CEO of NaphCare, Inc. will be dismissed with | |
|------|---|--|
| 2 | prejudice. | |
| 3 | Upon substitution, NaphCare, Inc. will replace defendant Bradford T. McLane, CEO o | |
| 4 | NaphCare in the caption of Case No. 2:22-cv-01438-JAD-DJA. | |
| 5 | Dated this 28th day of November, 2022 | |
| 6 | | |
| 7 | LEWIS BRISBOIS BISGAARD & SMITH LLP | |
| 8 | | |
| 9 | By /s/Ethan M. Featherstone S. BRENT VOGEL | |
| 10 | Nevada Bar No. 006858 | |
| 11 | ETHAN M. FEATHERSTONE Nevada Bar No. 11566 | |
| 12 | 6385 S. Rainbow Boulevard, Suite 600 Las Vegas, Nevada 89118 | |
| 13 | Tel. 702.893.3383 Fax: 702.893.3789 | |
| 14 | Attorneys for Defendants NaphCare, Inc. and | |
| 15 | Bradford T. McLane, CEO NaphCare, Inc. | |
| 16 | $M^{-}I$. I | |
| 17 | By MG Name | |
| 18 | Michael Gerard Naessens 304 S. Jones Blvd., #457 | |
| 19 | Las Vegas, NV 89107 | |
| 20 | T: 702-930-6270 Email: naessensvsalva@gmail.com | |
| 21 | Plaintiff Pro Se | |
| 22 | | |
| 23 | | |
| 24 | | |
| 25 | | |
| 26 | | |
| 27 | | |
| 28 l | | |

LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW

4885-8917-1006.1

1 MARQUIS AURBACH 2 3 By /s/ Trisha R. Delos Santos 4 Craig R. Anderson, Esq. 5 Nevada Bar No. 6882 Trisha R. Delos Santos, Esq. 6 Nevada Bar No. 15902 10001 Park Run Drive 7 Las Vegas, Nevada 89145 Telephone: (702) 382-0711 8 Facsimile: (702) 382-5816 9 canderson@maclaw.com Attorneys for Defendant LVMPD 10 **CLARK HILL** 11 12 By /s/ William D. Schuller 13 WILLIAM D. SCHULLER, ESO. Nevada Bar No. 11271 14 3800 Howard Hughes Parkway, Suite 500 Las Vegas, Nevada 89169 15 Telephone: (702) 862-8300 Facsimile: (702) 862-8400 16 Email: wschuller@clarkhill.com 17 Attorney for Defendants, Lawrence H. Richardson, Jr. and 18 Amanda Leigh Hedrick 19 20 **ORDER** 21 Based on the parties' stipulation [34] and good cause appearing, IT IS SO ORDERED. 22 NaphCare, Inc. is substituted in the place of Bradford T. McLane, and the Clerk of Court is directed to TERMINATE McLane as a party and ADD NaphCare, Inc. as a party. 23 24 And because the termination of McLane as a party moots his motion to dismiss, IT IS ORDERED that McLane's motion to dismiss and the motion to strike Naessens's surreply to that motion [11] 25 [32] are DENIED as moot. 26 UNITED STATES DISTRICT JUDGE 27 11-28-22 28

BRISBOIS
BISGAARD
& SMITH LLP
ATTORNEYS AT LAW

4885-8917-1006.1